

SHEPPARD MULLIN RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
JAMES L. MCGINNIS, Cal. Bar No. 95788
MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4106
Telephone: 415-434-9100
Facsimile: 415-434-3947
E-mail: ghalling@sheppardmullin.com
jmcginnis@sheppardmullin.com
mscarborough@sheppardmullin.com

HELEN C. ECKERT, Cal. Bar No. 240531
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1448
Telephone: 213-620-1780
Facsimile: 213-620-1398
E-mail: heckert@sheppardmullin.com

Attorneys for Defendants
SAMSUNG SDI CO., LTD.,
SAMSUNG SDI AMERICA, INC.,
SAMSUNG SDI (MALAYSIA) SDN. BHD.,
SAMSUNG SDI MEXICO S.A. DE C.V.,
SAMSUNG SDI BRASIL LTDA.,
SHENZHEN SAMSUNG SDI CO., LTD. and
TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

This Document Relates to:

All Indirect Purchaser Actions

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,
et al.*, No. 13-cv-1173;

*Sharp Elecs. Corp. v. Koninklijke Philips
Elecs. N.V.*, No. 13-cv-02776;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-

**DECLARATION OF HELEN C. ECKERT
IN SUPPORT OF SDI DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

[RE SDI'S MIL NO. 2]

1 05261;

2 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*,
3 No. 11-cv-05513;

4 *Best Buy Co., et al. v. Technicolor SA, et al.*,
5 No. 13-cv-05264;

6 *Target Corp. v. Chunghwa Picture Tubes,*
7 *Ltd., et al.*, No. 11-cv-05514;

8 *Target Corp. v. Technicolor SA, et al.*, No. 13-
9 cv-05686;

10 *Sears, Roebuck and Co. and Kmart Corp. v.*
11 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
12 05514;

13 *Sears, Roebuck and Co. and Kmart Corp. v.*
14 *Technicolor SA*, No. 13-cv-05262;

15 *Viewsonic Corp. v. Chunghwa Picture Tubes,*
16 *Ltd.* No. 14-cv-02510.

1 I, Helen C. Eckert, declare as follows:

2 1. I am an associate at the law firm of Sheppard Mullin Richter & Hampton LLP,
3 counsel of record for Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.; Samsung
4 SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil Ltda.;
5 Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI"). I
6 submit this declaration pursuant to Civil Local Rule 79-5(d) to establish that documents or
7 portions of documents containing "Confidential" and "Highly Confidential" information pursuant
8 to the Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306) and submitted to the
9 Court in connection with SDI's Motion *In Limine* To Exclude Irrelevant And Highly Prejudicial
10 Portions of Plaintiffs' Trial Exhibit, Bates Stamped TSA-CRT-00077732 ("SDI's MIL No. 2") are
11 sealable. Except for those matters stated on information and belief, about which I am informed
12 and which I believe to be true, I have personal knowledge of the matters set forth herein and could
13 and would testify competently to each of them.

14 2. The parties have disclosed or produced in this action certain documents and
15 information designated as either "Confidential" or "Highly Confidential" pursuant to the
16 Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306).

17 3. On February 13, 2015, SDI filed an Administrative Motion to Seal and lodged the
18 following documents pursuant to Civil Local Rules 7-11 and 79-5(d) and (e):

19 a. Exhibits 1-2 of the Declaration of James L. McGinnis in Support of SDI's
20 MIL No. 2 ("McGinnis Declaration").

21 4. Pursuant to Civil Local Rule 79-5(d), I make this declaration on behalf of SDI to
22 provide the basis for the Court to maintain under seal Exhibit 1 to the McGinnis Declaration,
23 which has been designated as "Highly Confidential" pursuant to the Protective Order.

24 5. Exhibit 1 to the McGinnis Declaration is a true and correct copy of Plaintiffs'
25 certified translation of TSA-CRT00077732. Exhibit 1 contains, cites, identifies and/or compiles
26 confidential, non-public and sensitive business information, including confidential information
27 concerning SDI's prices. It also cites, identifies and/or compiles sensitive, private information
28 relating to personal matters of certain individuals at SDI. This information is confidential, the

